



SEMP-14		U.S. Army-Hawaii	
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## SEMP-14: Evaluation of Compliance

### 1. Purpose

To describe the U.S. Army-Hawaii's procedure for evaluation of compliance with applicable legal and other requirements.

### 2. Definitions

Definitions and acronyms are included in the SEM Manual.

### 3. Requirement [ISO 14001:4.5.2] and Procedure

ISO Requirement	Procedure
<p>Consistent with its commitment to compliance, the organization shall establish, implement and maintain a procedure for periodically evaluating compliance with applicable legal requirements.</p> <p>The organization shall evaluate compliance with other requirements to which it subscribes. The organization may wish to combine this evaluation with the evaluation of legal compliance or to establish a separate procedure(s).</p>	<p>U.S. Army-Hawaii has established, implemented, and maintains a procedure for periodically evaluating compliance with applicable legal and other requirements. Legal and other requirements are identified in accordance with <i>SEMP-04: Legal and Other Requirements</i>.</p> <p>Compliance with legal and other requirements is evaluated through several processes, including:</p> <ul style="list-style-type: none"><li>• Internal inspections</li><li>• External inspections</li><li>• Internal and External assessments under Environmental Performance Assessment System (EPAS)</li></ul> <p>Internal inspections (e.g. environmental media-specific compliance, fuel storage tanks, hazardous waste storage, industrial wastewater discharges, drinking water monitoring) are routinely conducted by the Environmental Division and other designated personnel (e.g. ECOs) throughout the installation's facilities, as applicable based on regulatory and permit requirements.</p> <p>External inspections (e.g. environmental compliance, natural resources, cultural resources, permits) are periodically conducted by the regulatory agencies, such as DOH and EPA. The Environmental Division maintains records of these inspections, in addition to initiates and coordinates with affected units/organizations, the corrective and preventive actions for findings identified.</p> <p>Internal assessments of EPAS are conducted annually by the Environmental Division staff as part of their regular management, checking, and corrective action functions, unless an external assessment is conducted that year.</p> <p>Internal assessments of EPAS are to be conducted in</p>

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	<p>accordance with the IMPC-HI-PWE No. 292 Internal Assessment Standard Operating Procedure and the AR 200-1 chapter 16-1.</p> <p>External assessments of EPAS are to be conducted by the Army Environmental Command (AEC) about every three years.</p> <p>The primary purpose of the inspections and assessments are to evaluate compliance of units/organizations against regulatory drivers and to proactively identify and correct potential deviations from operational controls, consequently preventing or minimizing environmental degradation.</p>
The organization shall keep records of the results of the periodic evaluations.	Records of the results of periodic evaluations are kept on the Environmental Division shared drive or in the form of paper files by the Environmental Program Managers.

#### 4. Responsibilities

Responsible Party	Responsibilities
Army Environmental Command (AEC)	<ul style="list-style-type: none"><li>• Conducts EPAS external assessments about every three years.</li></ul>
Garrison Commander (GC)/ Sustainable Environmental Management Representative (SEMR)	<ul style="list-style-type: none"><li>• Participates in EPAS assessments, SEM audits, and external inspections, as necessary.</li><li>• Participates in internal compliance inspections and SEM conformance audits, as necessary.</li><li>• Ensures appropriate Command emphasis and resources are allocated to maintain compliance with environmental legal and other requirements.</li><li>• Reviews and approves installation-wide, mandated compliance inspection procedures (e.g., Environmental Compliance Inspections).</li><li>• Reviews compliance trends and the successes or failures of meeting applicable regulatory requirements based on briefings and reports provided by the environmental division.</li><li>• Provides input and directs changes as necessary to promote continual improvement of regulatory compliance.</li></ul>
Installation Environmental Division Chief (IEDC)	<ul style="list-style-type: none"><li>• Participates in EPAS assessments, SEM audits, internal and external inspections, as necessary.</li><li>• Participates in internal compliance inspections and SEM conformance audits, as necessary.</li><li>• Reviews results of inspections and audits with senior management.</li><li>• Oversees the management and documentation of compliance inspections and audits.</li></ul>
SEM Program	<ul style="list-style-type: none"><li>• Participates in EPAS assessments, SEM audits, internal and external</li></ul>

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Manager (SEMPM)	<p>inspections, as necessary.</p> <ul style="list-style-type: none"><li>• Participate in internal compliance inspections and SEM conformance audits, as necessary.</li><li>• Tracks documentation of compliance inspections and audits.</li></ul>
Environmental Division Staff	<ul style="list-style-type: none"><li>• Participates in EPAS assessments, SEM audits, internal and external inspections, as necessary.</li><li>• Conducts media specific internal environmental compliance inspections.</li><li>• Tracks and ensures monitoring requirements, stipulated in facility environmental permits issued by regulatory agencies, are met.</li><li>• Manages documentation of compliance inspections and audits for their respective program areas.</li></ul>
Environmental Division Compliance Inspectors	<ul style="list-style-type: none"><li>• Participates in EPAS assessments, SEM audits, internal and external inspections, as necessary.</li><li>• Conduct quarterly unannounced environmental compliance inspections of all U.S. Army-Hawaii industrial operations.</li><li>• Monitors compliance trends and notify affected units commanders and organizations Department Heads, Directors and Supervisors of inspection results via formal letters and/or emails.</li><li>• Brief CFT members and EQCC members on inspection results and compliance trends.</li></ul>
Environmental Quality Control Committee (EQCC) Members	<ul style="list-style-type: none"><li>• Participates in EPAS assessments and SEM audits, as necessary.</li><li>• Participate in compliance inspections and conformance audits.</li><li>• Review compliance trends and the successes or failures of meeting applicable regulatory requirements based on briefings and reports provided by the environmental division.</li><li>• Provide input and directs changes as necessary to promote continual improvement of regulatory compliance.</li><li>• Communicate/implement relevant environmental compliance requirements within their respective organization.</li></ul>
Cross Functional Team (CFT) Members	<ul style="list-style-type: none"><li>• Participates in EPAS assessments and SEM audits, as necessary.</li><li>• Participate in compliance inspections and conformance audits.</li><li>• Review compliance trends and the successes or failures of meeting applicable regulatory requirements within their respective organization.</li><li>• Provide input and directs changes as necessary to promote continual improvement of regulatory compliance.</li><li>• Communicate/implement relevant environmental compliance requirements within their respective organization.</li><li>• Provide inputs for management reviews during the CFT meetings.</li></ul>
Unit Commanders,	<ul style="list-style-type: none"><li>• Participates in EPAS assessments and SEM audits, as necessary.</li></ul>

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Department Heads, Directors and Supervisors	<ul style="list-style-type: none"><li>• Participate in compliance inspections and conformance audits.</li><li>• Review compliance trends and the successes or failures of meeting applicable regulatory requirements within their respective organization.</li><li>• Direct changes as necessary to promote continual improvement of their unit/organization compliance posture with environmental regulations.</li></ul>
Environmental Compliance Officers (ECOs)	<ul style="list-style-type: none"><li>• Responsible for knowing and abiding by the environmental regulations and operational controls affecting their respective facility.</li><li>• Report any successes or challenges in complying with applicable environmental regulations and operational controls to their Supervisors, CFT representatives or the Environmental Division.</li><li>• Conduct applicable internal inspections.</li><li>• Participate in internal and external compliance inspections and SEM audits, as necessary.</li></ul>
General Workforce (Military, Civilian, and other employees)	<ul style="list-style-type: none"><li>• Responsible for knowing and abiding by the environmental regulations and operational controls affecting their respective work practices.</li><li>• Report any successes or challenges in complying with applicable environmental regulations and operational controls to their Supervisors, CFT representatives, ECOs or the Environmental Division.</li><li>• Participate in internal and external compliance inspections and SEM audits, as necessary.</li></ul>
Contractors	<ul style="list-style-type: none"><li>• Responsible for knowing and abiding by the environmental regulations and installation applicable operational controls pertaining to the activities, product and/or services provided to the U.S. Army-Hawaii as part of their contracts.</li><li>• Conduct applicable internal compliance inspections of their operations.</li></ul>

## 5. References

- ISO 14001:2004(E), 4.5.2 Evaluation of Compliance
- AR 200-1 chapter 16-1
- IMPC-HI-PWE No. 292 Internal Assessment Standard Operating Procedure, 14 May 2010
- U.S. Army Hawaii SEM Manual
- SEMP-04: Legal and Other Requirements
- SEMP-17: Internal Audit

Revision Date	Nature of Revision	Document Review Participants
24 Jun 10	Updated to address internal audit finding	Jeff Stefani

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